

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

September 5, 2002

In the Matter of)	
)	
TELECOMMUNICATION RELAY SERVICE)	CC Docket No. 98-67
AND SPEECH-TO-SPEECH SERVICES)	
FOR INDIVIDUALS WITH)	
HEARING AND SPEECH DISABILITIES)	

**COMMENTS OF
COMMUNICATION SERVICE FOR THE DEAF, INC.**

On August 13, 2002, the FCC issued a Public Notice regarding the Petitions for Reconsideration of Action in Rulemaking Proceedings in the above matter, including petitions filed by both the Sprint Corporation ("Sprint") and WorldCom, Inc.

("WorldCom") concerning the Declaratory Ruling and Second Further Notice of the Proposed Rulemaking released on April 22, 2002 ("Declaratory Ruling").

Communication Service for the Deaf, Inc., a South Dakota non-profit corporation ("CSD"), a provider of telecommunications relay services ("TRS") and Internet relay services ("Internet Relay") respectfully submits its comments in support of the Sprint Petition, specifically with regard to the appropriate cost recovery mechanism for Internet Relay Service and waiver of minimum standards for Internet Relay providers.

CSD believes that there continues to be a lack of feasible assignment of calls to interstate or intrastate jurisdictions and that any allocations will be arbitrary. CSD further believes that Internet Relay providers should receive compensation from the Interstate TRS Fund for all such calls. In the event that a widespread, viable and workable,

solution is subsequently developed to allow the assignment of Internet Relay calls to either the interstate and intrastate jurisdictions, States should be bound to provide funding for Internet Relay services in a similar capacity and rate as the TRS Fund. . In addition, Internet Relay should be included in the minimum standards required for providing TRS in all States. Only then will Citizens of any particular State be protected from being adversely impacted from lack of availability of Internet Relay service, should a particular State refuse to fund Internet Relay services on the grounds that States may feel they are subsidizing the citizens of other States whose citizens are heavy users of the Internet and Internet Relay.

In sum, the Commission should permanently implement its decision in the Declaratory Ruling to compensate all Internet Relay providers from the Interstate TRS Fund, along with granting permanent waivers of those certain minimum standard requirements incapable of satisfaction by Internet Relay providers with current technology. In the event that the Commission adopts a cost recovery methodology using an allocation factor, it should alter the minimum standards of TRS for all States to include Internet Relay so that no citizen will be denied access to this crucial communication tool.

Respectfully submitted,

Communication Service for the Deaf, Inc.

John F. Archer, attorney for Communication Service for the Deaf
Hagen, Wilka & Archer, P.C.

100 S. Phillips Avenue, Suite 418
Sioux Falls, SD 57104
(605) 334-0005

September 2, 2002